

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| In Re: | : | |
| | : | Chapter 13 |
| BRADLEY D. WELDON | : | Case No. 16-16546-MDC |
| Debtors, | : | |
| | : | |
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| US BANK TRUST NATIONAL | : | |
| ASSOCIATION, as Trustee of the Preston | : | |
| Ridge Partners Investments Trust | : | |
| Movant, | : | |
| v. | : | Hearing: March 30, 2017 at 11:00 a.m. |
| | : | Courtroom #2 |
| BRADLEY D. WELDON | : | |
| Debtor, | : | |
| And | : | |
| | : | |
| William C. Miller, Esquire | : | |
| Trustee, | : | |
| | : | |
| Respondent. | : | |
| <hr/> | : | |

**US BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE PRESTON
RIDGE PARTNERS INVESTMENTS TRUST'S REQUEST FOR ADMISSIONS and
REQUEST FOR PRODUCTION OF DOCUMENTS**

Request for Admissions

Movant requests that within thirty (30) days of this request, the Debtor admit in accordance with Bankruptcy Rules 7036 and Federal Rules Civil Procedure 36, for purposes of this action only, the following facts.

1. Debtor, Bradley Weldon filed a bankruptcy petition under Chapter 13 of the Bankruptcy Code on September 15, 2016, at bankruptcy case number 16-16546-MDC.
2. Debtor is the Mortgagor and Real Owner of 422 East Spruce Street, Norristown, PA 19401.
3. US Bank Trust National Association, as Trustee of the Preston Ridge Partners Investments Trust is the holder of a note and mortgage dated August 31, 2006 on the Debtor's residence located at 422 East Spruce Street, Norristown, PA 19401.

4. Since September 15, 2016, the debtor has only made the following payments on the subject mortgage:

\$355.35 paid on or about November 15, 2016

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5. The debtor's monthly post-petition mortgage payments is \$355.22.
6. The debtor's post-petition mortgage arrears owed to Movant as of March 3, 2017 is \$1,420.62.
7. US Bank Trust National Association, as Trustee of the Preston Ridge Partners Investments Trust has standing to prosecute the motion for relief from stay.
8. The genuineness of Movant's proof of claim #19 filed February 10, 2017, including its attached note, mortgage and assignments of mortgage.

Very truly yours,
Parker McCay P.A.

By: /s/BRIAN E. CAINE

BRIAN E. CAINE
ATTORNEY ID NO. 86057
PARKER McCAY P.A.
9000 Midlantic Drive, Ste 300
P.O. Box 5054
Mt. Laurel, NJ 08054
(856) 596-8900

Date: March 3, 2017.

Request for Production of Documents

Movant requests that within thirty (30) days of this request, the Debtor, in accordance with Bankruptcy Rules 7034 and Federal Rules Civil Procedure 34, for purposes of this action only, produce the following documents:

This request applies to all documents in your possession, custody or control or in the possession, custody or control of persons acting or purporting to act on your behalf, including but not limited to your present and former agents, servants, contractors, employees, accountants, attorneys, investigators, indemnitors, insurers, consultants and sureties.

1. Copies of all cancelled checks or other proofs of monthly mortgage payments made since September 15, 2016, as it relates to Movant's mortgage for 422 East Spruce Street, Norristown, PA 19401
2. Copies of all bank statements of Debtor from September 15, 2016, through the present.
3. If you do not admit any of the requests for admissions above, any documents related to support of each of the non-admissions of same.

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| Trustee, | : |
| | : |
| Respondent. | : |
| | : |

CERTIFICATION OF SERVICE

I hereby certify that service upon all interested parties, indicated below, was made by sending true and correct copies of the Request for Admissions and Request for Production of Documents to the following:
Date Served: February 9, 2017

Persons served:

MICHAEL W. GALLAGHER, Esq.
401 West Johnson Highway
Suite 4
East Norriton, PA 19401
DEBTOR'S ATTORNEY – SERVED ELECTRONICALLY

Bradley D. Weldon
1650 Franklin Avenue
Willow Grove, PA 19090
DEBTOR – SERVED VIA REGULAR MAIL

By: /s/DAWN HOFFMAN
DAWN HOFFMAN

Dated: March 3, 2017